

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHRISTOPHER J. HADNAGY, an individual;  
and SOCIAL-ENGINEER, LLC, a  
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON  
COMMUNICATIONS, INC., a Washington  
corporation; and DOES 1-10; and ROE  
ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

**[PROPOSED]**  
ORDER GRANTING PLAINTIFFS'  
MOTION FOR CIVIL CONTEMPT AND  
SANCTIONS

Noted for Consideration: March 24, 2025

ORAL ARGUMENT REQUESTED

Having considered Plaintiffs Christopher Hadnagy and Social-Engineer's Motion for Civil Contempt and Sanctions, and the pleadings and records on file, it is hereby;

ORDERED, ADJUDGED, AND DECREED that Plaintiffs' Motion for Civil Contempt and Sanctions is GRANTED. Defendants are ordered to:

1. Pay compensatory damages in the amount of \$100,000.00 for the harm caused by the unauthorized disclosure and widespread dissemination of confidential information.


2. Pay sanctions in the amount of \$50,000.00 to deter future violations of this Court's orders.
3. Reimburse Plaintiffs for their reasonable attorney's fees and costs incurred in bringing this motion.
4. Immediately remove all postings and links to the disclosed information and issue corrective statements retracting their dissemination.
5. Certify compliance with this Order under penalty of perjury within five (5) days.

DATED this \_\_\_\_ day of \_\_\_\_, 2025.

\_\_\_\_\_  
Honorable Brian A. Tsuchida

Presented by:

FREY BUCK

\_\_\_\_\_  
  
Ted Buck, WSBA #22029  
Mark Conrad, WSBA #48135  
*Attorneys for Plaintiffs*

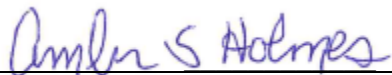
**CERTIFICATE OF SERVICE**

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below a copy of this document entitled **[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR CIVIL CONTEMPT AND SANCTIONS** on the following individuals:

David Perez, WSBA #43959  
Matthew J. Mertens (Pro Hac Vice)  
Lauren A. Trambley (Pro Hac Vice)  
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☐ Via USPS  
☒ Via Electronic Mail  
☒ Via Electronic Filing (CM/ECF)

DATED this 3rd day of March 2025, at Seattle, Washington.

  
Amber Holmes, Legal Assistant